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*Johnson & Johnson Health Care Systems Inc.*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

JOHNSON & JOHNSON  
HEALTH CARE SYSTEMS INC.,

: Civil Action No. 22-2632(JKS)(CLW)

Plaintiff,

: Hon. Jamel K. Semper, U.S.D.J.

v.  
  
SAVE ON SP, LLC, EXPRESS  
SCRIPTS, INC., AND ACCREDO  
HEALTH GROUP, INC.,

: Hon. Cathy L. Waldor, U.S.M.J.

: Hon. Freda L. Wolfson, Special Master

Defendants.

**NOTICE OF MOTION TO SEAL**

COUNSEL:

PLEASE TAKE NOTICE that on November 18, 2024 at 9:00 a.m., or as soon thereafter as counsel may be heard, the undersigned attorneys for plaintiff Johnson & Johnson Health Care Systems Inc. ("JJHCS"), together with counsel for

defendant Save On SP, LLC (“SaveOnSP”), will apply before the Honorable Freda L. Wolfson, Special Master at the United States District Court for the District of New Jersey, Martin Luther King Building & U.S. Courthouse, 50 Walnut Street, Newark, New Jersey 07101, for an Order:

- (a) Permanently maintaining under seal the letters and supporting exhibits filed by the parties in connection with SaveOnSP’s Motion to Compel JJHCS to Produce Documents Sufficient to Show the Instances in Which It Investigated, Enforced, or Contemplated Enforcing Any Portion of the May-Not-Use Provision, dated September 16, 2024, with related briefing dated September 26 and October 3, 2024 (ECF Nos. 383, 391, 399, & 415, filed September 18, September 27, October 4, 2024, and October 16, 2024) (the “May-Not-Use Enforcement Motion”); and
- (b) Permitting JJHCS to file the proposed public versions of the May-Not-Use Enforcement Motion, attached as Exhibits A, B, and C to the Declaration of Jeffrey J. Greenbaum submitted in support of this motion (“Greenbaum Declaration”).

PLEASE TAKE FURTHER NOTICE that in support of this motion, JJHCS will rely on the accompanying Greenbaum Declaration and the indices in support of this motion. A proposed form of Order is also attached.

PLEASE TAKE FURTHER NOTICE that pursuant to L. Civ. R. 7.1(d)(4), no brief is necessary inasmuch as the application presents issues that are a matter of familiarity to the Court.

Respectfully submitted,

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Dated: October 18, 2024